

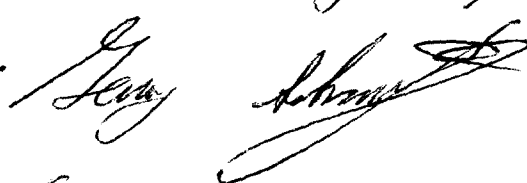
RE. CC Docket 92-77

AUG 01 1994

DOCKET FILE COPY ORIGINAL

Billed Party Preference ^{for zero plus} is the
best proposal I've ever seen.

It's the fairest and best
thing for the consumer. I fully
support it and play for it's passing.

Thank you,
Rev. 

Rev. Gerry Schwartz
558 Arlington Pl.
Cedarhurst N.Y. 11516

No. of Copies rec'd
List ABCDE

Orig.

Dee Dee Bernal

DOCKET FILE COPY ORIGINAL

5314 Pecan Valley Drive
San Antonio, TX 78223

July 20, 1994

RECEIVED

AUG 1 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Dee Dee Bernal

No. of Copies rec'd 1
List ABCDE

Barbara Winstead

DOCKET FILE COPY ORIGINAL

97 Plaza Drive
Universal City, TX 78148

July 20, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for O+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Barbara Winstead

No. of Copies rec'd _____
List ABCDE

DOCKET FILE COPY ORIGINAL

RECEIVED

July 20, 1994

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Krus Stark

No. of Copies rec'd 1
List ABCDE

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Glenn Dodson
214 Cicero
San Antonio, Tx.
78218

July 20, 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

DOCKET FILE COPY ORIGINAL

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Glenn Dodson

No. of Copies rec'd 1
List ABCDE

P.S. I oppose Clinton's
Communist's health
care plan too.

RECEIVED

AUG 1 1994

DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION
(OFFICE OF THE SECRETARY)

July 20, 1994

Rosaura Reyes
5200 Blanco # 311
S.A. Ju 178216

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Rosaura Reyes

No. of Copies rec'd 1
List ABCOE

Marilyn Henderson
326 Weathercock
San Antonio, TX 78239

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 20, 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

DOCKET FILE COPY ORIGINAL

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for O+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Marilyn Henderson

No. of Copies rec'd 1
List ABCDE



DOCKET FILE COPY ORIGINAL

OFFICE OF THE SHERIFF
CHESTERFIELD COUNTY

P.O. BOX 7 • CHESTERFIELD, VIRGINIA 23832 • (804) 748-1261

CLARENCE G. WILLIAMS, JR.
SHERIFF

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
(OFFICE OF THE SECRETARY)

Major Garland G. Stafford
Chief Deputy

Major Ronald C. O'Shields
Courts/Civil Process

Major Barry N. Woody
Jail Administrator

Captain David B. Hutton
Administrative Service

July 26, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: Billed Party Preference; CC Docket No. 92-77

Dear Chairman Hundt:

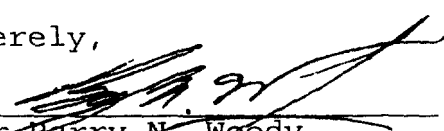
We are opposed to Billed Party Preference (BPP) at our County Jail.

Prior to the use of a single carrier that is equipped to handle inmate calls, with whom we have a contractual agreement, we were plagued by phone fraud and harassing phone calls. More than once we received calls from phone companies indicating they had been defrauded out of thousands of dollars by inmate phone schemes from within our facility. It was also not uncommon for citizens to call and complain of unwanted phone calls from inmates they did not even know.

With the implementation of our single carrier service these problems stopped. Not only were inmates' calls monitored which prevented illegal and inappropriate calls, but revenues were generated by commission which has assisted in paying for inmate services. A comparison of our carrier's rates as opposed to what the general public pays is our carrier is cheaper.

Without a doubt the single carrier service is the best way to go for our correctional facility and I would hate to think of the reoccurring problems awaiting us should (BPP) be adopted.

Sincerely,


Major Barry N. Woody
Jail Administrator
Chesterfield County Jail

cc: The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Andrew L. Barrett
The Honorable Susan Ness

No. of Copies rec'd
List ABCDE



OFFICE OF
MARION COUNTY SHERIFF
JOSEPH G. McATEE
40 South Alabama Street
Indianapolis, Indiana 46204
(317) 633-5181

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF RECORDS

July 21, 1994

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Barrett:

Over the last several months, I have read with great concern about the "Bill Party Preference" issue. As you can imagine, our Sheriff has received many letters and memo's regarding the bad effect Bill Party Preference is going to have on the inmate institutions. Most, if not all, have been forwarded to myself the person who handles the inmate telephone system.

I am very concerned about the increase of fraud and abuse, not to mention the additional work Billed Party Preference will create. Presently we have one long distance vendor serving our facility and we receive approximately three or four complaints a week concerning calls that can not be completed. The number of these calls seems to be increasing each month. In 99% of the cases, calls have been restricted by the long distance vendor because they are unable to collect revenue for the calls.

The long distance vendor uses a billing company which submits the charges to the local telephone company, which in turn places the charges on the monthly local telephone bill. We have found that when the local telephone company is not paid, neither is the long distance vendor and they attempt to restrict telephone calls to that number to eliminate an further loss of revenue. To further complicate this matter, if partial payment is made, the local telephone companies usually take their portion of the funds before attempting to pay any of the other vendors that may be included in the bill.

You can't fault the local telephone companies for taking their money first or the long distance companies for discontinuing service when they are not paid. This does however create a problem for the detention facility when people call and say they can not receive calls from the facility. We feel we are responsible to check into the problem and determine why the call is not being processed.

No. of Copies rec'd _____
List ABCDE

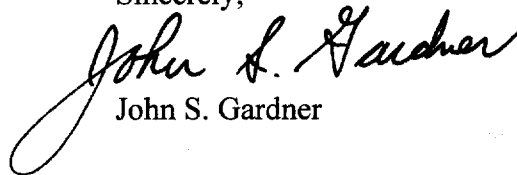
If Billed Party Preference is approved, it will be next to impossible to determine who is restricting calls from our facility and furthermore impossible to restrict death threats, harassing calls, etc. placed to victims of crimes.

I would like to recommend that Billed Party Preference not be passed and detention facilities be allowed to continue the use of equipment specifically designed to prevent fraud, abuse, and criminal activity over the telephone network.

In closing, you need to keep in mind that there are times you are not dealing with the honest citizen trying to receive a call from the jail, but instead, another criminal practicing his trade through the inmate telephone system.

If you have any questions feel free to call me at 317 231-8331.

Sincerely,

A handwritten signature in cursive script that reads "John S. Gardner". The signature is written in dark ink and is positioned above the printed name.

John S. Gardner

Cheryl Ornelas

DOCKET FILE COPY ORIGINAL

**15811 Wilderness Pkwy
San Antonio, TX 78232**

July 20, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Cheryl Ornelas

No. of Copies rec'd 1
List ABCDE

Julie Mitchell

DOCKET FILE COPY ORIGINAL

4819 Wordsworth
San Antonio, TX 78217

July 20, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Julie Mitchell

No. of Copies rec'd 1
List ABCDE

John D. Colvin, III
4911 La Posada
San Antonio, Texas 78233

DOCKET FILE COPY ORIGINAL
RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 20, 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for O+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

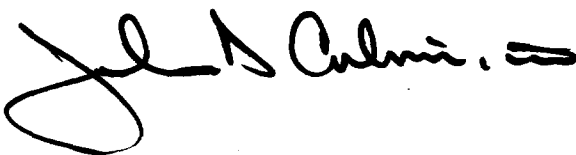
Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,



No. of Copies rec'd 1
List ABCDE

DOCKET FILE COPY ORIGINAL
DOCKET FILE COPY ORIGINAL



SDN Users Association, Inc.

P.O. Box 4014, Bridgewater, N.J. 08807

RECEIVED

AUG 1 1994

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

July 25, 1994

Mr. W. Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

Re: Docket 92-77, Billed Party Preference for 0+ InterLATA Calls

Dear Mr. Caton,

On behalf of the SDN Users Association I would like to restate our position on Billed Party Preference for 0+ InterLATA Calls. The Association believes that the current methods to access the 0+ services have the required functionality to reach the carrier of choice. This is the same position that we have communicated in the past, as well as at the meetings with Reed Hundt and Kathleen Levitz, on April 6, 1994.

Our Regulatory Affairs Committee has reviewed the record and the FCC's 'Further Notice of Proposed Rule Making' released June 6, 1994. Overall the Association is very pleased that the FCC is seeking to evaluate costs versus benefits for this proposal. Many benefits have been brought to the marketplace by the FCC's work since Divestiture. Our conviction is that the marketplace is competitive and that services will continue to emerge at reasonable prices.

We are not in a position to comment substantially on the implementation cost, since we are customers, not providers. However, the Association is concerned that the proposed rule, if implemented, will impact costs for the Local Exchange Companies (LEC) that ultimately will be passed on to the end user. If passed, the proposed rule-making could add substantial capital investment, operating cost, and complexity that would negatively effect the customer base using 0+ services. Currently, any exceptions to access availability are addressable through existing rules covering pay phones, such as the Telephone Operator Consumer Services Improvement Act (TOCSIA).

For these reasons and the ones stated in our letter of January 13, 1994, we continue to oppose the Proposed Rule Making for Docket 92-77.

Sincerely,

Linda L. Tratnik

Linda L. Tratnik
President

No. of Copies rec'd _____
List ABCDE _____

Copy to: A. Barrett R. Metzger
 R. Chong S. Ness
 R. Hundt J. Quello
 K. Levitz



City of Austin

FOUNDED BY CONGRESS, REPUBLIC OF TEXAS, 1839

DEPARTMENT OF AVIATION, 3600 MANOR ROAD, AUSTIN, TEXAS 78723, TELEPHONE (512) 472-5439, FAX (512) 469-0415

DOCKET FILE COPY ORIGINAL

AUG 01 1994

REC'D MAIL ROOM

July 27, 1994

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street -- Room 222
Washington DC 20554

Re: CC Docket No. 92-77, Phase II

Dear Mr. Canton:

The Billed Party Preference rule which the Federal Communications Commission seeks to promulgate will have an adverse financial impact on airports.

Robert Mueller Municipal Airport is a medium-hub airport, serving approximately five million total passengers a year. In our 160,000 square foot facility, there are approximately 100 pay telephones; 85% are non-credit card pay phones. If this rule as proposed is effected, Robert Mueller Municipal Airport could lose \$85,000 or more annually in revenue.

Over the past several years, Robert Mueller Municipal Airport, Austin, Texas, has averaged \$100,000 annual revenue in commission payments from our selected long distance carrier. Contracts to long distance carriers at airports around the United States are typically awarded competitively. The competition criteria includes not only commissions paid to the airport, but also services rendered to the airport and the traveling public.

Airports depend heavily on revenue from concessions, including telephones, to help offset the cost of operations within the airport terminals. Concessionaires pay airport operators commissions on the revenues derived from airport sales and services for the right to operate on airport property. As airlines continue to push for reduced landing and terminal lease fees, it is counterproductive to airports' efforts to hold down costs if other sources of revenue are cut off. We believe that promulgation of this rule will eliminate any incentive for long distance carriers to compete for the right to place pay telephones in airport terminals. The most dependable carriers will likely put the money saved from commissions into advertising and marketing. As a result, their market shares will remain comparable, but they will not be compelled to compensate airports for the use of airport property.

No. of Copies rec'd
List ABCDE

0+9

The Federal Communications Commission proposes to implement a rule to benefit a few customers and a few long distance carriers who choose not to focus their marketing resources on attracting loyal customers. In doing so, airports will likely lose revenue. The costs do not outweigh the benefits. It would be considerably more cost effective to implement a rule requiring the unblocking of access to other carriers. The burden then would be on the long distance carriers to market their services and the telephone customers to use access codes if they so desire.

We appreciate the opportunity to make these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles W. Gates", with a long horizontal flourish extending to the right.

Charles W. Gates
Director of Aviation

OFFICE PHONES:
(405) 257-5445
(405) 257-6234
(405) 257-6235
FAX (405) 257-5509

CHARLES SISCO

SHERIFF

SEMINOLE COUNTY, OKLAHOMA



WEWOKA, OKLAHOMA
74884

DOCKET FILE COPY OF

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 25, 1994

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, NW
Washington, D. C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party
Preference

Dear Mr. Barrett:

I oppose the application of Billed Party Preference (BPP) at inmate facilities.

I have analyzed the security and administration needs at my facility and I have found it necessary to route inmate calls from my facility to a single carrier that is equipped to handle inmate calls and with whom I have a contractual relationship. Inmates should not be allowed open access to the telecommunications network and the freedom to use any carrier they please. I have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network.

The sheriff's of rural Oklahoma cannot afford to provide this type of equipment without the help of inmate phone service providers. BPP will take away my right to coordinate inmate calls through a carrier I know and trust. Instead, inmates calls will be routed to a number of different carriers that will not provide the needed type of equipment to run a secure type system.

BPP would also eliminate the much need larger percent of revenue now paid to an individual correctional facility by a contracted individual carrier. That if calls are allowed to be routed to a number of different carriers, none of whom will have any obligation to us, these larger percentages of revenue to correctional facilities will be terminated. The carriers profits will increase and the quality of service

No. of Copies rec'd
List ABCDE

to the correctional facility and inmates will decrease and the rates charged by the carrier will remain the same. Without inmate phones, the moral of our inmates will be devastated and the increased tension will make it more difficult for our staff "one man per shift" to manage these inmates.

The sheriff's in Oklahoma are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions - decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

A handwritten signature in cursive script, reading "Charles Sisco".

Charles Sisco, Sheriff
Seminole County Sheriff Department
110 S. Wewoka Ave.
Wewoka, Okla. 74884

DOCKET FILE ONLY ORIGINAL

Curdy Riojas
404 S San Manuel
San Antonio, TX 78237

July 20, 1994

The Honorable Rachelle Chong
Federal Communications Commission
1919 M Street NW
Washington DC 20554

RECEIVED
AUG 1 1994
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

Dear Representative Chong:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for O+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

No. of Copies rec'd 1
List ABCDE



DOCKET FILE COPY ORIGINAL

Merced County Sheriff's Department

700 W. 22ND STREET
MAILING ADDRESS: 2222 "M" STREET
MERCED, CALIFORNIA 95340
TELEPHONE (209) 385-7360
FAX (209) 385-7659



TOM SAWYER
Sheriff-Coroner

HENRY STRENGTH
Assistant Sheriff
Operations

MIKE RAYMOND
Assistant Sheriff
Corrections

July 12, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Billed Party Preference; CC Docket Number 92-77

Dear Commissioner Barrett:

As Sheriff of Merced County, California, and a Jail Administrator, I am requesting that the Federal Communications Commission exclude local jails from the proposed "billed party preference" system for O+ Inter LATA payphone traffic rules.

While there may be ways to prevent fraud under B.P.P., we would be losing our ability to closely monitor phone calls during investigations and would likely lose our ability to quickly block calls to protect victims and witnesses from intimidation and family and friends from unwanted calls and harassment. These issues are very important to me and the citizens of Merced County.

Eliminating the O+ commissions received currently would have the effect of creating a host of unfunded mandates. California jails have Inmate Welfare Funds which are by law to provide for programs, services and facilities for inmates. Telephone commissions are the primary, in some cases sole, source of revenue for the Inmate Welfare Fund. Many of these programs and services are now mandated by law and the courts, primarily the Federal courts. Elimination of commission revenues would force jails to tap already strapped budgets to fund these mandates.

The services and programs provided by the Inmate Welfare Fund includes Adult Education, GED Programs, basic literacy training, job training, substance abuse and family counseling, Chaplains, religious services and many more. Even basics such as supplying indigent inmates with personal hygiene supplies and letter writing material are provided for by this fund.

No. of Copies rec'd 042
List ABCDE

AN AFFIRMATIVE ACTION/EQUAL OPPORTUNITY EMPLOYER

DRUG USE
IS
LIFE ABUSE

The Honorable Andrew C. Barrett
July 12, 1994
Page Two

These programs would cease or have to be funded with tax dollars. Merced County has already been forced to close its libraries and parks, suspend building maintenance and eliminate several hundred jobs. We obviously cannot replace the dollars we would lose if our commission revenues are eliminated.

Before you make any decision, please stop and listen to the thousands of local jails that will be dramatically and adversely impacted by your failure to exclude them from the B.P.P. System. Every State has different laws governing its jails. I can only speak for our California laws and under them failure to exclude jails would be devastating.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tom Sawyer". The signature is fluid and cursive, with a long horizontal line extending from the "T" and a large, stylized "S" for "Sawyer".

Tom Sawyer, Sheriff-Coroner

TS:cvg

DOCKET FILE COPY ORIGINAL

Glenn Dodson
214 Cicero
San Antonio, Tx.
78218

July 20, 1994

The Honorable Rachelle Chong
Federal Communications Commission
1919 M Street NW
Washington DC 20554

RECEIVED
AUG 1 1994
FEDERAL COMMUNICATIONS COMMISSION

Dear Representative Chong:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

No. of Copies rec'd _____
List ABCDE

Sincerely,

Glenn Dodson

P.S. I oppose Clinton's
communistic health
care plan too.

DOCKET FILE COMMUNICATIONS

RECEIVED

AUG 1 1994

July 20, 1994

The Honorable Rachelle Chong
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Rosaura Reyes
5200 Blanco #311
S.A. IV 78216

Dear Representative Chong:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for O+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Rosaura Reyes

No. of Copies rec'd
List ABCDE

1

"Cleveland County
Grows Greater"



"Cleveland County
Sheriff's Department"

Docket # 92-77

DOCKET FILE COPY ORIGINAL

P. O. BOX 1508 SHELBY, NORTH CAROLINA 28150

BUDDY R. McKINNEY
SHERIFF

RECEIVED

AUG 1 1994

FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

July 27, 1994

The Honorable Rachelle B. Chong
Federal Communications Commission
1919 M. Street, NW
Washington, D.C. 20554

Re: CC Docket No 92-77 Opposition to Billed Party Preference

Dear Commissioner Chong:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. The equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmates families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The

No. of Copies rec'd _____
List ABCDE

Page 2

proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we found to be necessary at our facility, ultimately reducing phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,



Max E. Blanton, Chief Jailer
Cleveland County Jail
100 Justice Place, Shelby, NC 28150

MEB/pbs